

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                                  |   |                      |
|----------------------------------|---|----------------------|
| Albert William Bleau, Jr.,       | : |                      |
|                                  | : |                      |
| Plaintiff                        | : |                      |
|                                  | : |                      |
|                                  | : |                      |
| vs.                              | : | Civil Action         |
|                                  | : | No. 04-10469JLT(REK) |
|                                  | : |                      |
| Greater Lynn Mental Health       | : |                      |
| & Retardation Association, Inc., | : |                      |
| et al.,                          | : |                      |
|                                  | : |                      |
| Defendants                       | : |                      |

**Motion Of Defendant**  
**Bridgewell, Inc., For A Protective Order**

Defendant Bridgewell, Inc., (formerly Greater Lynn Mental Health & Retardation Assoc., Inc., see Docket No. 104) moves as a complement to its opposition to the motion of plaintiff Albert William Bleau, Jr., (Mr. Bleau) for leave to conduct additional discovery (Docket No. 94, filed 23 November 2005)<sup>1/</sup> that the Court, pursuant to Fed. R. Civ. P. 26(c), enter a protective order limiting or phasing discovery.

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<sup>1/</sup> The parties previously requested by joint motion that the Court postpone consideration of Mr. Bleau's discovery motion while they conducted a discovery conference as required by Local Rules 16.1(b) and 37.1. The parties have since requested in their Joint Proposed Discovery Plan, previously filed, that the Court take up consideration of the motion together with Bridgewell's opposition to it.

In support of its motion, Bridgewell relies upon the memorandum included in its simultaneously filed opposition to Mr. Bleau's motion. Bridgewell states the reasons for and suggests the form of an appropriate order in that memorandum.

WHEREFORE, defendant Bridgewell Inc., requests that the Court grant its motion for a protective order.

by its attorneys,

/s/ Christina Schenk-Hargrove  
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Dated: 3 February 2006

CERTIFICATE OF SERVICE

I hereby certify that this (these) document(s), filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non-registered participants on

3 February 2006.

s/Christina Schenk-Hargrove